To: Rothery, Deirdre[Rothery.Deirdre@epa.gov]

From: Beeler, Cindy

Sent: Wed 3/2/2016 11:23:53 PM

Subject: FW: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance Test

Results

Dee -

Just got the okay (in the email chain below) for the following footnote:

Ex. 5 - Deliberative Process

Cindy Beeler

US EPA Region 8, Energy Advisor Office of the Regional Administrator

Tel: 303-312-6204 Beeler.Cindy@epa.gov

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From: Mia, Marcia

Sent: Wednesday, March 02, 2016 4:17 PM

To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>

Cc: Garwood, Gerri < Garwood.Gerri@epa.gov>; Jason Huckaby < Jason.Huckaby@erg.com> **Subject:** RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance Test Results

That works for me. Do you need Jason to do anymore looking?

Marcia B Mia

Office of Compliance/Air Branch

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Beeler, Cindy

Sent: Wednesday, March 02, 2016 6:06 PM

To: Mia, Marcia < Mia. Marcia@epa.gov >; Johnson, Steffan < johnson.steffan@epa.gov > Cc: Garwood, Gerri < Garwood.Gerri@epa.gov >; Jason Huckaby < Jason.Huckaby@erg.com > Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Thanks for quick response Marcia (esp. at late hour Back East).

Ex. 5 - Deliberative Process

How about this footnote:

Ex. 5 - Deliberative Process

Cindy Beeler

US EPA Region 8, Energy Advisor Office of the Regional Administrator

Tel: 303-312-6204 Beeler.Cindy@epa.gov

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From: Mia, Marcia

Sent: Wednesday, March 02, 2016 3:45 PM

To: Beeler, Cindy < Beeler, Cindy@epa.gov >; Johnson, Steffan < johnson.steffan@epa.gov > Cc: Garwood, Gerri < Garwood.Gerri@epa.gov >; Jason Huckaby < Jason.Huckaby@erg.com > Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Importance: High

Ex. 5 - Deliberative Process

Marcia B Mia

Office of Compliance/Air Branch

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Beeler, Cindy

Sent: Wednesday, March 02, 2016 4:53 PM

To: Mia, Marcia < Mia. Marcia@epa.gov>; Johnson, Steffan < johnson.steffan@epa.gov>

Cc: Garwood, Gerri < Garwood. Gerri@epa.gov>

Subject: FW: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Marcia & Stef -

Ex. 5 - Deliberative Process

Background – Due to high ozone recorded over the last few years (recent 8-hour average of 120 ppb) in the Uinta Basin in NE Utah, R8 is drafting a reservation-specific FIP to address emissions from ~8,000 existing wells. We go beyond NSPS OOOO because, for example, the majority of those existing sites are small emitters (e.g. < 6 TPY on tanks), and we have ~1800 small glycol dehydrators that are not in urban area clusters.

Besides protecting air quality on Indian country we also wanted to help bring a level playing field in the Basin between facilities on Utah state land and on Indian country. Utah rules include a 95% DRE on control devices for tanks, dehyds etc. so that is what we used. OAQPS has pushed back and we are now using language that bridges the "designed for 98% but achieve at least 95%" type language.

Cindy Beeler

US EPA Region 8, Energy Advisor Office of the Regional Administrator

Tel: 303-312-6204 Beeler.Cindy@epa.gov

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From: Garwood, Gerri

Sent: Thursday, February 18, 2016 1:26 PM

To: Smith, Claudia < Smith. Claudia @epa.gov >; Beeler, Cindy < Beeler. Cindy @epa.gov >

Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Ex. 5 - Deliberative Process

Gerri

919-541-2406

From: Smith, Claudia

Sent: Thursday, February 18, 2016 11:31 AM

To: Garwood, Gerri; Beeler, Cindy

Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Thanks,

Claudia

From: Garwood, Gerri

Sent: Wednesday, February 17, 2016 3:04 PM
To: Beeler, Cindy < Beeler.Cindy@epa.gov >
Cc: Smith, Claudia < Smith.Claudia@epa.gov >

Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Ex. 5 - Deliberative Process

Gerri

919-541-2406

From: Beeler, Cindy

Sent: Wednesday, February 17, 2016 4:39 PM
To: Garwood, Gerri < Garwood. Gerri@epa.gov >
Cc: Smith, Claudia < Smith. Claudia@epa.gov >

Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Ex. 5 - Deliberative Process

Cindy Beeler

US EPA Region 8, Energy Advisor Office of the Regional Administrator Tel: 303-312-6204 Beeler.Cindy@epa.gov

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From: Garwood, Gerri

Sent: Wednesday, February 17, 2016 1:43 PM To: Beeler, Cindy < Beeler.Cindy@epa.gov > Cc: Smith, Claudia < Smith.Claudia@epa.gov >

Subject: RE: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance

Test Results

Hi Cindy,

I do not have a table of that information.

Ex. 5 - Deliberative Process

Gerri

From: Beeler, Cindy

Sent: Tuesday, February 16, 2016 3:54 PM

To: Garwood, Gerri < Garwood. Gerri@epa.gov >
Cc: Smith, Claudia < Smith. Claudia@epa.gov >

Subject: Table of DREs achieved in NSPS OOOO Combustor Manufacturer Performance Test

Results

Gerri -

Ex. 5 - Deliberative Process

Thanks,

Cindy Beeler

US EPA Region 8, Energy Advisor Office of the Regional Administrator Tel: 303-312-6204 Beeler.Cindy@epa.gov

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